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Application No.: 10/003,773

Docket No.: TSQ-001RCE2

REMARKS

Claims 1 and 27-31 have been amended. Claims 25-26 and 33 have been previously cancelled. No claims have been added or deleted. Claims 1-24, 27-32 and 34-37 will be pending following the entry of these Amendments.

Claim Objections

The Examiner objected to claims 27, 30 and 31 because they recite "that when executed" in the preamble. Applicants have amended the preamble of claims 27, 30 and 31 to address the Examiner's concerns and believe claims 27, 30 and 31 to be in order for allowance.

Claim Rejections Pursuant to 35 U.S.C. §103

Claims 1-8, 14-24, 27-32 and 34-37 were rejected under 35 U.S.C. 103(a) as being unpatentable over Rivette et al (United States Patent Number 5,806,079, hereafter "Rivette") in view of Cole et al. (United States Patent Number 6,571,239 B1, hereafter "Cole"). For the reasons set forth below, these rejections are respectfully traversed.

The Examiner stated that Rivette does not teach a "metastructure maintaining a list of a plurality of relationship changes occurring over time" as recited in Applicants' claim 1 and 27, (Office Action, p. 9, last ¶) but relied on Cole as teaching the claim limitation. Applicants respectfully submit that Cole also fails to teach or suggest the cited claim limitation either before or after the amendment submitted herein.

Summary of Claimed Invention

The claimed invention claims a method for cross-referencing, searching and displaying entries in a document publishing system. Unique identification numbers are automatically assigned to entries in the publishing system. Each entry has a metastructure associated with it. When changes are made to a selected entry or a label associated with the entry, a new entry with an entry identification number is created. The new entry containing the changes is cross-linked with the original selected entry. The metastructure is then updated to reflect the relationship

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changes caused by the new entry. The metastructure maintains a list of the relationship changes and the time the changes were made thus showing how the entry has evolved over time.

Summary of Claim Amendments

Applicants have amended independent claims 1 and 27 to amend the previously specified "relationship changes *occurring over time*" so as to further specify that the metastructure maintains a list of "relationship changes *between the selected entry and at least one other entry that show an evolution of said selected entry over a time period that includes a time period before said updating.*" Thus, the metastructure includes historical data that shows not only the current state of relationships for the selected entry but also lists the previous relationships between the selected entry and other labels/entries. The "relationship changes" referenced in claim 1 and 27 are caused by a new entry altering the data contained in either the selected entry or a label associated with the selected entry.

Summary of Cole

Cole discusses a keyword search engine that associates keywords with data objects. Upon a user entering keywords, the data objects associated with the keywords are provided for a user's review. Cole discusses recording the keywords input by a user in a query for a search engine and holding them until the user is satisfied with the results or ends a session. If in a query session the user is satisfied with the objects retrieved from the repository, the system associates the keywords with the retrieved objects, (Col. 2, lines 46-50). These associations are then added to an either a master or auxiliary index. When the index or auxiliary index reaches a maximal size determined by the application or the constraints of the hardware, the oldest and least frequent associations are deleted, (Col. 4, lines 25-28).

Argument

The cited reference Cole fails to teach or suggest a "metastructure maintaining a list of a plurality of relationship changes **between the selected entry and at least one other entry that show an evolution of said selected entry over a time period that includes a time period before said updating,**" as recited by Applicants' claims 1 and 27.

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The Examiner states that the "metastructure" of the present application reads on the "keyword index" of Cole, (Office Action, p. 4, ¶ 5). Applicants respectfully disagree.

Applicants' metastructure is associated with an entry and shows the evolution of that entry over time. As noted on page 11, lines 21-25 of Applicants' specification: "By tracking the changes to the original entry and automatically cross-linking newly created entries to the original entry the illustrative embodiment is able to present the data contained in the entries to a user from a number of different time perspectives. The content can be tracked as it changes over time and the updated information presented from any of the cross-linked entries." Applicants respectfully submit that at least this aspect of the claimed invention that shows the evolution of an entry is lacking from the keyword index in Cole that the Examiner cited as the equivalent of the claimed metastructure.

In Cole, the keyword index maps keywords to data objects. The data objects are then provided to a user in response to a query that uses the keywords. If a particular set of keywords submitted in a query results in data objects being provided to a user that meets with the user's approval, the index is updated so that future use of the query keywords will result in the same data objects being provided to a requesting user. Either a new mapping is created in an index or the old mapping is overwritten. This mapping process differs significantly from the claimed metastructure recited in Applicants' independent claims. Regardless of whether the Examiner would like to consider either the data objects or the originally mapped keywords as the equivalent of the "selected entry" recited in Applicants' claims, there is no indication that the keyword index maintains "a list of a plurality of relationship changes between the selected entry and at least one other entry that show an evolution of said selected entry over a time period that includes a time period before said updating." If the keyword index was the equivalent of the claimed metastructure, the keyword index would have to maintain a list of "a plurality of relationship changes" for a particular data object or keyword. The "plurality of relationship changes" would show an evolution of the selected entry over a time period that includes a time before the updating of the keyword index/metastructure. There is no indication in Cole that this occurs.

The Examiner cited col. 6, lines 30-43 as disclosing the metastructure claim elements. However, the cited section only references session statistics that indicate when and how often a

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keyword associated with a data object was used (see col. 6, lines 34-37). This does not teach or suggest a listing of "a plurality of **relationship changes** between the selected entry and at least one other entry", required by Applicants' claims.

Accordingly, Applicants respectfully submit that the combination of Rivette and Cole does not teach or suggest all of the features of claims 1 and 27. Claims 2-24, 32, 34 and 35 depend from claim 1 and, as such, incorporate each and every element of claim 1. Claims 28-31, 36 and 37 depend from claim 27 and, as such, incorporate each and every element of claim 27. Therefore, Rivette and Cole, alone or in any reasonable combination, fail to teach or suggest the features of 1-8, 14-24, 27-32 and 34-37 for at least the reasons argued above with respect to claims 1 and 27. Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claims 1-8, 14-24, 27-32 and 34-37 under U.S.C. § 103(a).

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CONCLUSION

In view of the above, Applicants believe the pending application is in condition for allowance.

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